Sample

An Illustration of what an

Area Organic Plan

might Look Like

(For the organic certification of product harvested in the wild)

I. Description of the Area to be Certified. Provide as complete a picture as possible, including the means by which the boundaries of the area were determined, complete with aerial maps. Explain how the boundaries of the wild species to be harvested were established, including verification by wildlife biologists, game and fish officials, etc.

II. Products proposed for certification. List all of the products to be certified that will be harvested from this area.

III. Summary of the Management System. Give a complete description of the supervision of this area, the harvesting techniques used, how the harvested products are transported, where they are processed and stored and who the responsible persons are at each stage of the system.

IV. Determination of Qualification of the Area. Describe, in detail, how it was determined that the area to be certified qualifies as an organic site. Who attested to the uncontaminated state of the entire habitat? How was it determined that the species to be harvested for certification remain in the area to be certified? What independent parties made these determinations---wildlife biologists, game and fish officials etc.

V. Inspectability of the Area. Describe the feasibility of verifying, on site, that the boundaries of the area, the management system and the qualification for certification can be inspected. Is the entire area accessible? Who can help verify the organic character of the area?

VI. Sustainability. What steps are taken to assure that harvest levels are consistent with the ecological needs of the area and a sustained population of the species harvested? What consultants, or officials, public and private, are assisting with making these determinations? What kind of environmental due-diligence is being undertaken to prevent contamination of the area? What steps are being taken to protect non-target species and the habitats of species indigenous to the area? Project the plans being implemented to achieve these goals for the next three years.

VII. Internal Control System. What steps have been taken to make certain that everyone connected with this project understands the objectives of organic certification and sustainable management? What is being done to verify that all personnel are adhering to organic standards? What educational and regulatory programs have been put into place?

VIII. Audit Trail. Describe the system by which all products to be harvested from this area are traceable and that an unbroken chain of custody can be verified.

Of Wildness and Organic

{A Statement of Principles Regarding the Organic Certification of Organisms Harvested in the Wild]

Frederick Kirschenmann, Chair, NOSB Livestock Committee

Can an organism grown in the wild be certified and labelled "organic"? To date the organic community has not agreed to a consistent answer to that question. Nor, to my knowledge, has it attempted to develop a statement of principles that can guide it in reaching a consensus on the issue.

Nevertheless, during the past decades organic certifiers have, from time to time, certified and labeled products "organic" that were produced in the wild. Honey (produced by bees in the wild), wild rice, wild blueberries etc. have all appeared on the market with organic labels.

Background

The debate regarding the place of wild production in organic labelling intensified recently when the National Organic Standards Board's Livestock Committee began to consider whether or not wild animals could be included in its recommended standards of organic production. The Livestock Committee took up this issue in part because the Organic Foods Production Act of 1990 provides an opportunity to create standards for the certification of animals caught in the wild. [6502(11)]

In an initial position paper prepared for the NOSB Livestock Committee, Kathleen Merrigan and Mark Keating outlined the difficulties of certifying wild animal production and recommended that the NOP "should not develop organic certification standards for wild animals." The basis of this recommendation was their assessment that it was impossible "to ensure compliance with an organic plan" because wild animals "spend significant portions of their life beyond the producer's control."

The Organic Trade Association's Organic Certifiers Caucus Steering Committee informed the NOSB recently that in their opinion "the concept of wild fish and organic certification are inherently incompatible" and that they did not believe there was "much support in the existing organic industry for the extension of organic standards to encompass wild animals."

On the other hand numerous individuals and organizations have urged the NOSB to include wild animal production in the organic standards. For example, Michael Morrissey, Director of the Oregon State University Seafood Laboratory reminded the NOP that objecting to the inclusion of wild seafood in the organic standard because ocean environments cannot be controlled failed to recognize that the "the environmental area where seafood is harvested" on the West Coast of the United States, to cite one instance, "are some of the cleanest waters in the world." He points out that this is true because of the prevailing winds and ocean currents from the West and because "the continental shelf drops off rapidly a short distance from the shore" thereby ensuring that these waters "are only affected in a very small way by human activities." Mr. Morrissey asserts, therefore, that if we were to state "by a federal document that ocean harvested fish are not organic" it would be an "erroneous and misleading" statement. Such a standard, he asserts, would introduce the contradiction of allowing "marketing advantage to species, i.e. aquacultured fish that may originate from areas less wholesome than the open ocean."

In public comment at the June 1999 NOSB meeting AgriSystems International also argued for the inclusion of wild animals in the organic standard, pointing out that the problems of monitoring and identification highlighted in the Keating/Merrigan paper can be overcome by applying organic principles to "the catch area, which may be defined precisely through mapping and testing."

After certifying wild products separately from organic (with a separate "wild" label) for many years, the Certification Committee of Farm Verified Organic recently submitted a position paper to the NOSB Livestock Committee outlining some of the issues it is dealing with concerning the relationship of wildness and organic systems. They point out that wild products are already labeled as organic consumer products under EC Regulations (2092/91) IFOAM Basic Standards and the standards of several North American certifiers.

They now intimate (similar to the suggestions of Morrissey and AgriSystems International above) that it may be possible to certify such products for the organic market by approaching the certification function in terms of certifying an "area." They note, for example, that in Argentina organic honey is being harvested from hives that are located in a vast desert where "virtually no human activity occurs" for 300-400 kilometers on either side of the hive location.

The FVO Certification Committee is currently wrestling with the issue of whether or not a specific wild fish "area" is certifiable. They point out, however, that even if the "forage area" is certifiable, other organic standards must also be verifiable, namely, "sustainable harvesting techniques, non-contamination of region and/or product by human intervention, inspectability, and appropriate documentation of all of these aspects." Beyond that the processing of the product must, of course, comply with organic standards. These various components are consistent with the Organic Foods Production Act which outlines four principle areas that must be considered for certifying organic livestock (whether wild or domestic)---feed source, health care, parentage, and identification/record keeping. One can presume that the OFPA requires a sustainability component under the health care mandate.

Principles

To resolve these conflicting views in the organic community we need to adopt a set of principles that are consistent with organic philosophy. This paper is an effort to begin the process of evolving such a philosophical foundation.

At the outset it should be very clear to everyone in the organic community that "organic" and "wildness" are closely linked An organic system of agriculture, after all, seeks to *mimic nature.* Crop rotations and orchard floor management techniques are designed to mirror nature's succession. The integration of crop/livestock systems, symbiotic planting arrangements, and the establishment of predator/prey relationships are all aimed at mimicking nature's mutualisms. Developing nutrient cycling methods on organic farms is an effort to mimic nature's own nutrient cycling system. (Kevan, et. al., 1997)

So to argue that wild systems are not certifiable for organic labels, while domesticated organic systems are, is saying that we will certify

the **copy** but **not** the **original**. That is clearly not a defensible position.

Furthermore, most organic practitioners recognize that to be successful at the art of organic farming, one needs to work in concert with wildness. Organic farms are not isolated islands of production, they are part and parcel of the watershed ecosystems in which they are located. Accordingly, attending to the ecological health of the watershed is essential to the ecological health of the farm. And the ecological health of the watershed can only be sustained so long as the interdependent species that evolved there (and their habitats) are maintained.

In the long run, therefore, organic farms are inextricably linked to the wild context in which they exist. The development of landscape habitat to restore wild species that evolved in the watershed is important to any farming system. And for farms (like organic farms) that do not substitute exogenous inputs for such healthy natural systems it is essential. Gary Nahban has written extensively and eloquently of these farming/wildness connections. If farming is to be productive and sustainable for the long term then farming in the context of healthy wildness is vital. (Nabhan, 1997, Buchmann and Nabhan, 1996) These connections were recently confirmed in an experimental study conducted in Europe. (Thies and Tscharntke, 1999)

Eventually, therefore, to be sustainable, organic farmers may have to cooperate with one another to extend ecological practices to the watershed level and fold their farmed fields into that larger landscape. The resultant habitat would invite the return of many native species which could simultaneously restore the ecological health of the watershed and enhance agricultural productivity. Wild and organic systems simply cannot be separated in organic production.

One could argue, therefore, that organic farming outside the context of wildness is neither feasible nor sustainable.

Secondly, the notion that organic farms are controlled environments while wild areas are unpredictable open spaces is an assertion that cannot be substantiated from observation. Granted livestock on a farm are fenced in while deer roam the landscape. But to assume that the real estate boundaries of a farm keep it free of unwanted

contamination, or that wild animals have no habitual behavior that enable us to track their comings and goings, is a perception that cannot be confirmed in actuality.

Real estate boundaries are not impermeable walls. Wind carries dust particles from my neighbor's Treflan-laden fields on to my organic fields. Dioxin released into the air by a neighbor who burns plastic (PVC) in his incinerator floats onto "organic" pastures grazed by "organic" cows. PCB's and other ubiquitous toxins have been found thousands of miles from their point source. (Colburn, et. al., 1996) Consequently unacceptable levels of contaminants have to be monitored in **any** organic operation, be it in the confines of a particular piece of privately owned and fenced in real estate, in a watershed, or in an ocean current.

That awareness reminds us, once again, that the "organic" label does not guarantee "purity," it validates production practices. Any accompanying guarantee concerning the absence of toxic contamination has to be corroborated by periodic testing, as the Organic Foods Production Act makes clear. And that is true for organic farms as well as for wild areas.

Furthermore, the notion that wild animals are "boundless" while domesticated animals are confined to pristine areas is also misleading. All species are ecosystem specific. Were it not so there would be no such thing as "invader species." As Niles Eldredge reminds us there is no such thing as a global ecosystem, there are only local ecosystems. (Eldredge, 1995) And local ecosystems are defined, in part, by the various plant and animal species that co-evolved in that place. The wild animals in any local ecosystem are, therefore, by definition, largely confined to the space in that ecosystem.

Additionally, wild animals, for the most part, are very habitual creatures. Native Americans successfully hunted buffalo based on their knowledge of the bison's habitual grazing patterns. Blackbirds in my watershed always traverse the same flight patterns year after year. I can accurately predict blackbird perdition in my sunflower fields based on those behavioral patterns. Deer hunters tell me that they can scout potential hunting areas in the Spring of the year and predict with certainty that the prize buck they spotted will still be in the same two-mile radius when hunting season opens in the Fall. Every beekeeper with whom I have spoken assures me that they can

predict with certainty where bees will forage based on the flowering forages that are available to the bees at any given time.

All of this would suggest that it is theoretically conceivable to certify "areas" in the wild with *area* organic plans in the same way that we certify farms, with *farm* organic plans. Granted the areas considered for certification would be larger, certifiers and their clients would have to garner much more comprehensive information, and the monitoring system would have to be much more extensive. But given the close links between organic and natural systems, the similarity between the two systems regarding potential contamination, and the wild context in which domesticated organic systems operate, one can **not** reasonably argue that the two systems are **incompatible.**

If that is true, then to arbitrarily rule wild production systems out of the organic standard would be a case of discrimination that cannot be defended.

Furthermore, arbitrarily disallowing wild production from organic labelling could have additional, unanticipated, negative ecological consequences. For example, if the only bison, elk or other wild animals that can be certified, are those confined to fenced-in areas on organic farms, then it may further domesticate these species. Many worry that such domestication will destroy the natural resilience of these animals and eventually make them incapable of surviving in the wild on their own.

On the other hand, if there are areas, (tribal reservations, for example) where wild animals are allowed to roam free, and such areas could become certifiable in accordance with organic standards, it might encourage producers to keep more of these animals in the wild.

Principles in Practice

Assuming that we could come to agreement on the principles of an organic standard for wildness, there remains, of course, the difficult task of implementing the standard in practice.

I believe that the FVO Certification Committee is correct when they imply that there are essentially three components to the potential certification of wild production---the *area*, the *management* and the

handling operation. The handling operation would include confirmation that the harvesting process was not destructive to the environment and sustained the growth and production of the wild product. Such confirmation is essential to preserving the natural organic character of the ecosystem.

In accordance with this approach, the first task in any certification of a wild product would be to determine the area that has to be certified. In other words, what are the boundaries of the organism targeted for harvest. Obviously, for wild animals the area would be much larger than it is for wild plants, given the mobility of animals.

Once the enclosure of the organism has been determined, based on natural ecosystem boundaries and/or the known behavioral patterns of that species, then the on site inspection process would have to determine that the usual requirements of organic certification within that area can be confirmed.

The certifier would then have to determine that management and handling systems are in place to preserve the natural organic character of the ecosystem from which wild organisms are being harvested, and that the usual audit trails, etc. are in place.

Can It Be Done?

To establish that something is appropriate in principle and that it can theoretically be done is not the same as practically being able to do it. But the practical feasibility of certifying wild production is not an issue of standards and therefore not a criteria for the NOSB to consider. Our task is to establish standards that are as consistent as possible and that are in accord with organic principles. Whether or not those standards can be applied to any specific situation *in practice* is for certifiers to determine through the usual certification procedures, including the crafting of an organic plan and the on-site inspection procedures. This is true for both domestic and wild systems.

In my opinion there will probably be very few areas on this planet where wild organisms still exist in a natural organic environment. But if there are such places, (or if such places can be restored) places where natural nutrient cycling systems are still functioning, where human activity has not yet disrupted natural systems nor contaminated the area with substances that would make the

harvested products unfit for organic certification, then we have an obligation to allow such products to carry some kind of organic label.

The Label

That leaves us with the question of what kind of label wild products should carry. Some argue that since wild and domestic systems are managed differently labels should recognize those distinctions. Some have already suggested labels to distinguish products harvested in the wild. "Naturally organic" "organic in the wild" "wild harvested, organically processed" are some of the labels that have been proposed. Others argue that there should be no separate label since the Organic Foods Production Act calls for identifying standards for organically produced products and does not allow for separate labelling of wild vs non-wild organically produced products.

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